

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BODYGUARD PRODUCTIONS,
INC., ET AL.,

Plaintiffs,

v.

RCN TELECOM SERVICES OF
MASSACHUSETTS, LLC and RCN
TELECOM SERVICES, LLC,

Defendants.

No. 3:21-cv-15310-FLW-TJB

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO DISMISS
PLAINTIFFS' COMPLAINT**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a date and time set by the Court, the undersigned, counsel for Defendants RCN Telecom Services of Massachusetts, LLC and RCN Telecom Services, LLC, shall, before The Honorable Freda L. Wolfson, Chief United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, NJ, move for dismissal of Plaintiffs' Complaint in the above-captioned action for the reasons set forth in the accompanying Memorandum of Law.

Pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), RCN respectfully requests that the Court hold oral argument on this Motion.

Dated: October 19, 2021

Respectfully submitted,

By: Edward F. Behm, Jr.

Edward F. Behm, Jr.

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**Pro Hac Vice forthcoming*

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LLC and RCN Telecom Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of October, 2021, I caused a copy of the foregoing to be served upon all counsel of record via ECF notification.

By: Edward F. Behm, Jr.
Edward F. Behm, Jr.